

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

GOVERNMENT OF THE UNITED
STATES VIRGIN ISLANDS,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.

Defendant/Third-Party Plaintiff,

v.

JAMES EDWARD STALEY

Third-Party Defendant.

Case Number: 1:22-cv-10904-JSR

**JAMES EDWARD STALEY’S MOTION FOR LEAVE TO
WITHDRAW JONATHAN DUNN AS COUNSEL OF RECORD**

Pursuant to Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, Third-Party Defendant, James Staley, by and through undersigned counsel, respectfully submits this Motion for Leave to Withdraw Jonathan Dunn as Counsel of Record. In support, Third-Party Defendant states as follows:

1. On May 24, 2023, the Court entered an Order [Docket No. 164] granting admission *pro hac vice* to Jonathan Dunn as counsel for Third-Party Defendant in the above-captioned litigation.
2. Third-Party Defendant now moves for leave to withdraw Mr. Dunn’s appearance in this action because of Mr. Dunn’s forthcoming departure from Williams & Connolly LLP on September 1, 2023.

3. Withdrawal is sought with notice to and consent from Third-Party Defendant. Third-Party Defendant remains represented in this action by legal counsel from Williams & Connolly, including but not limited to undersigned counsel.

4. Granting this motion will not cause any undue delay in these proceedings or prejudice any party.

For good cause shown, Third-Party Defendant James Staley respectfully requests that the Court grant this motion and enter an order permitting the withdrawal of Jonathan Dunn as counsel of record and removing him from the list of attorneys receiving electronic notices of filings and proceedings in this action.

Dated: August 31, 2023

Respectfully submitted,

By: /s/ Jonathan Dunn

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